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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LATESHA WATSON,

Plaintiff,

v.

CITY OF HENDERSON; BRISTOL
ELLINGTON; KEVIN ABERNATHY;
KENNETH KERBY; RICHARD DERRICK;
RICHARD MCCANN; NICK VASKOV;
KRISTINA GILMORE; DOES I through X,
inclusive,

Defendants.

Case No.: 2:20-cv-01761-APG-BNW

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO
RESPOND TO MOTIONS TO DISMISS
AMENDED COMPLAINT**

(FIRST REQUEST)

(ECF 104, 109 AND 110)

Plaintiff, LaTasha Watson ("Watson") by and through counsel of record, Marc P. Cook, Esq. of the law firm of COOK & KELESIS, LTD.; Defendants, Kevin Abernathy ("Abernathy"), Richard McCann ("McCann") and Kenneth Kerby ("Kerby"), by and through counsel of record, Nicholas M. Wieczorek, Esq. of the law firm of CLARK HILL PLLC; and Defendants City of Henderson (the "City"), Richard Derrick, Bristol Ellington, Nicholas Vaskov and Kristina Escamilla Gilmore (the "Individual City Defendants" and collectively with the City, the "City of Henderson Defendants"),

1 by and through counsel of record, Patrick G. Byrne, Esq. of the law firm of SNELL & WILMER
2 LLP, hereby stipulate to extend the deadline for Plaintiff to respond to Defendants Nicholas Vaskov
3 and Kristina Escamilla Gilmore's Special Motion To Dismiss the First Amended Complaint
4 Pursuant to NRS 41.660 (filed January 3, 2022) [ECF 104]; Defendants Kevin Abernathy, Richard
5 McCann and Kenneth Kerby's Motion to Dismiss Plaintiff's First Amended Complaint (filed
6 January 14, 2022) [ECF 109]; and to Defendants City of Henderson, Richard Derrick, Bristol
7 Ellington, Nicholas Vaskov, and Kristina Escamilla Gilmore's Motion to Dismiss First Amended
8 Complaint (filed January 14, 2022) [ECF 110].

- 9 1. Defendants have filed three (3) motions which seek dismissal of all claims against
10 them under a variety of arguments relying on various legal theories.
- 11 2. Plaintiff's Response to Vaskov's and Gilmore's Special Motion to Dismiss [ECF
12 104] is due on January 18, 2022. The parties have agreed to extend that deadline by
13 3 weeks, until Tuesday, February 8, 2022. The parties have agreed to a similar
14 extension for the reply, which will be due on or before Tuesday, March 8, 2022.
- 15 3. Plaintiff's Response to the City Defendants' Motion to Dismiss [ECF 110] is due
16 January 28, 2022. The parties have agreed to extend that deadline by 3 weeks, until
17 February 18, 2022. The parties have agreed to a similar extension for the reply,
18 which will be due on or before Friday, March 18, 2022.
- 19 4. Plaintiff's Response to Abernathy, McCann, and Kerby's Motion to Dismiss [ECF
20 109] is January 28, 2022. The parties have agreed to extend that deadline by 3
21 weeks, until February 18, 2022. The parties have agreed to a similar extension for
22 the reply, which will be due on or before Friday, March 18, 2022.
- 23 5. As each of the Defendants have differed positions and/or relationships within the
24 City and are alleged to have engaged in separate conduct related to Plaintiff's claims,
25 Plaintiff needs additional time to analyze the reasoning set forth in the motions and
26 prepare responses addressing the arguments raised by Defendants.
- 27 6. Defendants anticipate that they will need a similar extension of time to prepare
28 replies to Plaintiff's responses.

7. The extensions are sought in good faith and not for the purpose of delay.

DATED this 19th day of January, 2022.

DATED this 19th day of January, 2022.

COOK & KELESIS, LTD.

CLARK HILL PLLC

By: *Marc Cook /s*

MARC P. COOK, ESQ.

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JULIE L. SANPEL, ESQ.

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Attorneys for Plaintiff, Latesha Watson

By: *Nicholas Wieczorek /s*

NICHOLAS M. WIECZOREK, ESQ.

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Las Vegas, Nevada 89169

Attorney for Defendants Kevin Abernathy,

Richard McCann and Kenneth Kerby

DATED this 19th day of January, 2022.

By: *Richard Gordon /s*

PATRICK G. BYRNE, ESQ.

Nevada Bar No. 007636

RICHARD C. GORDON, ESQ.

Nevada Bar No. 009036

PAUL SWENSON PRIOR, ESQ.

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Defendants City of Henderson, Richard

Derrick, Bristol Ellington, Nicholas Vaskov

and Kristina Escamilla Gilmore

ORDER

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

Dated: January 28, 2022